

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

CARLOS MEDINA CENTENO

DEBTOR

CASE NO 16-04961-MCF

CHAPTER 13

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

NOW COMES, CARLOS MEDINA CENTENO, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays:

1. The debtor is hereby submitting a proposed amended Plan, dated November 29, 2016, herewith and attached to this motion.
2. This proposed amended Plan is filed to increase the Plan base in order to cure the "insufficiently funded" issue raised by the Trustee in his unfavorable recommendation (docket #23).

WHEREFORE debtor respectfully requests the confirmation of the requested amended Plan, dated November 29, 2016.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non CM/ECF participants: debtor in the above captioned case, and to all creditors and parties in interest appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 29th day of November, 2016.

/s/ Roberto A. Figueroa Colón

ROBERTO A. FIGUEROA COLON
USDC #300105
FIGUEROA & SERRANO, PSC
PO BOX 1635
GUAYNABO PR 00970-1635
TEL. NO. (787) 744-7699

United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE:

Case No. **3:16-bk-4961**

MEDINA CENTENO, CARLOS

Chapter **13**

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input checked="" type="checkbox"/> AMENDED PLAN DATED: 11/29/2016 <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<p>I. PAYMENT PLAN SCHEDULE</p> <p>\$ 500.00 x 12 = \$ 6,000.00 \$ 506.00 x 48 = \$ 24,288.00 \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____</p> <p style="text-align: right;">TOTAL: \$ 30,288.00</p> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: <input type="checkbox"/> Sale of Property identified as follows: _____ <input type="checkbox"/> Other: _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ 30,288.00</p> <p>III. ATTORNEY'S FEES (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 2,868.00</p> <p>Signed: /s/ CARLOS MEDINA CENTENO Debtor</p> <p>Joint Debtor</p>	<p>II. DISBURSEMENT SCHEDULE</p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</p> <p>2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. Firstbank Puerto Ric Cr. _____ Cr. _____ # Claim 1-1 # _____ # _____ \$ 15,559.78 \$ _____ \$ _____</p> <p>3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</p> <p>4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: _____</p> <p>5. <input type="checkbox"/> Other: _____</p> <p>6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to: _____</p> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____</p> <p>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</p> <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) * After confirmation of Plan Trustee will pay Firstbank PR (POC 1-1) concurrently with attorney's fees in a 50/50% basis; once attorney's fees are paid in full the Trustee will pay Firstbank PR (POC 1-1) ahead any other secured claim. * Debtor to provide Adequate Protection Payments to Firstbank Puerto Rico through the Trustee in the sum \$277 per month until confirmation, and to be paid retroactively since petition date. * Debtor to provide auto insurance (Eastern America Insurance Company) upon maturity to Firstbank Puerto Rico through Chapter 13 Plan. * Late filed claims filed by creditors will receive no distribution. * Debtor reserves the right to object claims after Plan confirmation. * ASUME: arrears (\$7,926.78) will be paid through the Trustee. Debtor to continue making current direct payments to ASUME.</p>

Attorney for Debtor **Figueroa & Serrano, PSC**

Phone: **(787) 744-7699**

Label Matrix for local noticing
0104-3
Case 16-04961-MCF13
District of Puerto Rico
Old San Juan
Tue Nov 29 14:35:10 AST 2016

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AGUADILLA, PR 00605-0541

FIRSTBANK PR
PO BOX 9146
SAN JUAN, PR 00908-0146

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

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San Juan, PR 00910-2318

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Att Services
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San Juan, PR 00919-2830

CREDITONE, LLC
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METAIRIE, LA 70004-0625

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AT&T/C/O Midland Bankruptcy
5407 Andrews Hwy
Midland, TX 79706-2851

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BANKRUPTCY DIVISION - CODE 248
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Philadelphia, PA 19101-7346

Island Finance
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assignee of Citibank (South Dakota),
N.A.
Resurgent Capital Services
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LVNV Funding, LLC its successors and assigns
assignee of Household Bank (SB), N.A.
Resurgent Capital Services
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Greenville, SC 29603-0587

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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Carol Stream, IL 60197-4191

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Bypassed recipients	0
Total	25